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BEFORE THE POSTAL REGULATORY COMMISSION WASHINGTON, D.C. 20268-0001

MAIL PROCESSING NETWORK RATIONALIZATION SERVICE CHANGES, 2012

Docket No. N2012-1

INTERROGATORIES OF THE AMERICAN POSTAL WORKERS UNION, AFL-CIO TO THE UNITED STATES POSTAL SERVICE (APWU/USPS-17) (February 24, 2012)

Pursuant to Rules 25 through 28 of the Rules of Practice, American Postal Workers Union, AFL-CIO directs the following interrogatories to United States Postal Service.

Instructions and Definitions applicable to these Interrogatories are contained in the Interrogatories of the American Postal Workers Union, AFL-CIO to the United States Postal Service witness David E. Williams (APWU/USPS-T1-1-4), filed on December 22, 2011, and are hereby incorporated by reference.

Respectfully submitted,

Darryl J. Anderson Jennifer L. Wood Counsel for American Postal Workers Union, AFL-CIO **APWU/USPS-17** The list of approved AMP consolidations released on February 23, 2012 shows some offices as consolidating originating and destinating mail and some facilities as undergoing "full" consolidation.

- a) Please explain the difference between consolidating originating and destinating mail and a "full" consolidation.
- b) Does "full" consolidation indicate the building will be vacated? Are there other types of consolidations that will lead to the building being vacated? If so, please identify those.
- c) Given the completion of the AMP studies, can you now identify the locations that will be used as transportation hubs? If so, please provide a listing of those locations.